CITY OF ALBUQUERQUE



Office of the City Attorney
David Tourek, City Attorney
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VIA EMAIL & MAIL

February 7, 2014

Santiago E. Juarez, Esq. 1822 Lomas Blvd. N.W. Albuquerque, New Mexico 87104

Cheryl McLean, Esq. 914 Lomas Blvd. N.W. Albuquerque, New Mexico 87102

RE: Merlinda Perea and Francine Puentes, Co-Personal Representatives of the Wrongful Death Estate of Jerry Perea and on Behalf of the Minor, BP v. City of Albuquerque, Albuquerque City Police, APD Officer David Baca and APD Officer Andrew Jaramillo Cause No. CIV-13-00263 RB/RHS

Dear Counsel:

Albuquerque

PO Box 1293

New Mexico 87103

www.cabq.gov

In reviewing my file and the Court's docket, it does not appear that either of you have ever served Plaintiffs' Initial Disclosures in this case as is required. Therefore, I would appreciate it if you could provide me with you Initial Disclosures no later than February 12, 2014 so that I will not have to move to compel this information. Also, I plan on scheduling the depositions of witnesses Ricardo Astorga, David Bradford, Fred Casaus, Ricardo Padilla, Albert Rivera, and Richard Sandoval. I would like to schedule these depositions during the week of February 24th so please let me know your availability.

Thank you for your anticipated cooperation in this regard.

Stephanie M. Griffin

Sincerely,

Managing Litigation Attorney

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